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August 29, 2025

**VIA ECF**

Magistrate Judge Katharine H. Parker  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: Joint Status Letter Pursuant to Dkt. No 61, Initial Case Management Conference Order.**

*Perpetual Ashare v. Sontag & Hyman, P.C et al.*, Case 1:25-cv-02834-GHW-KHP

Dear Judge Parker:

The undersigned, along with co-counsel Manhattan Legal Services, represents Plaintiff Perpetual Ashare in the above-entitled action. Defendants are Sontag & Hyman, P.C., and a principal at the firm, Marc H. Hyman, (collectively the “Attorney Defendants”); and property owners East Harlem Mec Parcel C, L.P., and East Harlem MEC Parcel C Housing Development Fund Corporation and their property management companies, Richman Property Services Inc. and Metro 125, Inc. (collectively the “Landlord Defendants”).

The parties write jointly to provide an update on the status of the case pursuant to Your Honor’s July 10, 2025 Initial Case Management Conference Order, Dkt. No. 61.

The Parties have exchanged initial disclosures. The Parties have exchanged their respective interrogatories and requests for document production, the responses for which are due beginning September 5. The Plaintiff has served subpoenas on the architect for Landlord Defendants and on the Department of Buildings, two entities that the Landlord Defendants contend in their Initial Disclosures have knowledge of relevant facts. Responses are due September 8.

Plaintiff has noticed Zoom depositions as follows: September 10 at 10:00 AM for a corporate representative for Defendant East Harlem MEC Parcel C L.P.; September 12 at 11:00 AM for Defendant Marc H. Hyman. The Landlord Defendants have noticed the Zoom deposition of Plaintiff Perpetual Ashare on October 24 at 11:00 AM.

A settlement conference is scheduled for September 15, 2025, at 2:00 p.m.

The undersigned thanks the Court for its consideration.

Sincerely,  
/s/  
Ahmad Keshavarz